

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF TENNESSEE**

IN RE: DANNY LANE KEYS,	)
DBA Honey-Do Handyman Services;	)
DBA Timberline Resort; FDBA DIAN ó DAN	)
ENTERPRISES, LLC.	) 12-07578-2RM-13
and	)
JANICE DIANE KEYS,	)
DEBTOR(S)	)
80 TIMBERLINE ROAD	) Chapter 13
CROSSVILLE, TN 38571	)
XXX-XX 8108 XXX-XX-0264	)

**RESPONSE AND OBJECTION TO DEBTORS MOTION TO MODIFY CHAPTER 13  
PLAN AND REQUEST FOR HEARING**

**Deadline to File A Response is September 30, 2014 and the Date of the Scheduled Hearing is November 13, 2014. The hearing will be held at L. Clure Morton Federal Bld & Post Office, 9 Broad St, Cookeville, TN 38501 at 9:30 AM; the Motion to which Debtor is responding is Motion to Modify Chapter 13 Plan;**

NOW COMES Glenn and Bea Terry, Creditors in the above referenced case, by and through their Attorney, and objects to and responds to Debtors Motion to Modify Chapter 13 Plan; In support Creditors avers:

Debtors Motion stated all secured claims have been paid in full. Glenn and Bea Terry have a secured claim based upon a continuing monthly payment. Debtors have failed to make all the payments on this claim and therefore have not complied with the terms and conditions of their pending Chapter 13. Furthermore, an Agreed Order was granted by this Court outlining Debtors payments and balance owed Creditors at the end of 60 months. A pre mature Discharge does not comply with the terms and conditions of the Agreed Order and the amount owed Creditors and time of payments would be inaccurate. Debtors motion would make it necessary to Amended the previous Order with the new terms and conditions consistent with the premature Discharge.

**WHEREFORE:**

Creditors Glenn and Bea Terry respectfully request Debtors Motion be denied. Creditors furthermore request, a hearing be scheduled on Debtors motion and request a full accounting of Debtors payments and amending the Agreed Order previously entered by this Court, if necessary.

This September 26, 2014

**/S/ HOWARD G. PICK**

Howard G. Pick #017686

Attorney for Debtors

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**Attorney's Certificate of Service**

This is to certify that I have served a copy of the within and foregoing Response To Debtors Motion To Modify Chapter 13 Plan, by hand delivery, Electronic Delivery (ECF) or by depositing a copy of said Documents in the United States Mail in a properly addressed envelope with sufficient postage attached thereto to assure safe delivery with postage prepaid to or by ECF Court Electronic Mail to Chapter 13 Trustee, US Trustee, and Debtors Attorney Steven L. Lefkovitz and by 1<sup>st</sup> Class Mail to Debtors Danny and Janice Keys 80 Timberline Rd., Crossville, TN 38571.

This September 26, 2014

*/S/ Howard G. Pick*

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